

## Roberts, Rachel (ENRD)

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**From:** Nesbitt, Tanya (ENRD)  
**Sent:** Friday, July 28, 2017 2:27 PM  
**To:** jason\_matson@cfc.uscourts.gov  
**Cc:** 'Richard Stephens'; Cecilia Fex; Roberts, Rachel (ENRD)  
**Subject:** Beres, No. 03-785: Scheduling phone call to discuss developments in the case

Hi Jason,

I am counsel of record for the United States in the case of *Beres v. United States*, 03-785. I have cc'd counsel for plaintiffs, Cecilia Fex and Richard "Dick" Stephens on this e-mail. My co-counsel, Rachel Roberts is also copied here.

In the parties' last telephonic status conference with the Court on May 18, 2017, Judge Horn encouraged the parties to reach out to you as questions and issues arose related to our trial preparations. Currently, the parties are interested in briefing one motion and one cross-motion for partial summary judgment related to the adverse possession issues in the case. While we plan to mention this in our upcoming joint status report due on July 31, 2017, we think it may be useful to give the Court some information about the timing of the motions and talk through any concerns the Court may have well in advance of our filing.

The parties have determined that we are available for a call at the following times next week:

- 1) Tuesday, August 1st – 12:00 -12:30 p.m. EDT
- 2) Wednesday, August 2<sup>nd</sup>- 2:00 p.m.-2:30 p.m. EDT
- 3) Thursday, August 3<sup>rd</sup> - 12:00 -12:30 p.m. EDT

Do any of these dates work for you?

We greatly appreciate your time and look forward to speaking with you.

Thanks.



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